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Attorneys for Michael G. Kasolas, Claims
Representative

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Case No. 19-30088-DM

Chapter 11 (Lead Case)
(Jointly Administered)

**STIPULATION TO ADVANCE FUNDS
TO CLAIMS REPRESENTATIVE**

This Stipulation to Advance Funds to Claims Representative (the “Stipulation”) is entered into between Michael G. Kasolas, the Court appointed claims representative (the “Claims Representative”) and PG&E Corporation and Pacific Gas and Electric Company, the above-captioned debtors (the “Debtors”).

RECITALS

A. On November 11, 2019, the Honorable Dennis Montali, United States Bankruptcy

1 Court, Northern District of California, entered the Order Extending Bar Date for Fire Claimants
2 and Appointment of Claims Representative (the “Bar Date Extension Order”). (Docket No. 4672,
3 filed Nov. 11, 2019.)

4 B. The Bar Date Extension Order provides that the Claims Representative shall be
5 given broad discretion to conduct certain tasks described in the Bar Date Extension Order (the
6 “Tasks”) for the benefit of Unfiled Fire Claimants.¹

7 C. On December 3, 2019, the Claims Representative filed his First Report, which
8 includes a description of the proposed strategy, current status, and projected budget (the “First
9 Report”). (Docket No. 4963.)

10 D. The Bar Date Extension Order provides that the Claims Representative may apply
11 to the Court for approval of advance fees or costs if deemed necessary in order to successfully
12 complete the Tasks.

13 E. The Claims Representative has determined that advance funds in the amount of
14 **\$395,000.00** are required in order to successfully initiate efforts to complete the Tasks (the
15 “Advance”).

16 F. The Advance will be used to purchase and pay for advertising and third-party non-
17 Team member services as described in the First Report.

18 G. Receipt of the Advance is required as soon as possible to ensure that media and
19 other third-party services can be timely purchased and paid for.

20 STIPULATION

21 1. Subject to Bankruptcy Court approval, the Debtors agree to advance the requested
22 funds.

23 2. The Advance will be paid via wire(s) to the Claims Representative and/or to a
24 member(s) of his Team (instructions to be provided) so that it is received within three (3) business
25 day following entry of the Order approving this Stipulation.

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27 ¹ Capitalized terms not defined herein shall have the meaning ascribed to them in the Bar Date
28 Extension Order.

1 **THE FOREGOING IS AGREED.**
2
3

4 DATED: December 3, 2019

WENDEL ROSEN LLP

5
6 By: /s/ Lisa Lenherr

Mark S. Bostick

Lisa Lenherr

7 Attorneys for Michael G. Kasolas, Claims
8 Representative
9

10 DATED: December 3, 2019

WEIL GOTSHAL & MANGES, LLP

11
12 By: /s/ Matthew P. Goren

13 Matthew P. Goren

14 Attorneys for Debtors and Debtors in Possession
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